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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, }
Plaintiff, } 2:09-cr-00077-JCM-PAL
vs. }
JAN LINDSEY, }
Defendant. } **GOVERNMENT DISCLOSURE
STATEMENT**

Pursuant to LCR 16-1(b)(2) of the Local Rules of Practice for the District of Nevada, Eric Johnson, Chief, Organized Crime Strike Force, contacted defense counsel for defendants, Richard Frankoff, Assistant Federal Public Defender, for defendant Jan Lindsey, to discuss scheduling of discovery in the instant case. The Government and defense counsel could not reach an agreement as to the date for providing certain discovery in the instant matter. Consequently, the Government has moved forward with providing discovery in this matter and is filing this Government Disclosure Statement. The Government agrees to provide discovery in the instant case as follows:

Discovery Schedule

A. The Government as of this date has provided:

1. All statements, documents, and objects, including audio or video recordings, required to be disclosed under Rules 16(a)(1)(A)-(F), Federal Rules of Criminal Procedure.

3. Disclose any reports or memoranda of interviews of witnesses the government intends to call in its case in chief.

4. Disclose any statements of witnesses under Title 18, United States Code, Section 3500.

D. The Government hereby makes any and all demands for reciprocal disclosures from the defendant under Federal Rule of Criminal Procedure 16.

The disclosures set forth above apply to those objects, documents, items, and other disclosure matters that are in the possession, custody, or control of the parties at the time the obligation to disclose arises. The Government recognizes that it has a continuing duty to provide disclosures up to and through trial as to any matters required to be disclosed by statute, rule, or the United States Constitution. Additionally, the Government's intent is that nothing in this statement is intended to limit, or in any way affect, the determination of admissibility of evidence at trial or otherwise restrict or expand the remedies available to the Court for any breach of disclosure obligations as set forth in Rule 16(d).

The Government holds itself available to make good faith efforts to confer with defense counsel to resolve informally any dispute over the scope, manner and method of disclosures before seeking relief from the Court.

DATED: May 7, 2009

**GREGORY A. BROWER
United States Attorney**

/s/ Eric Johnson

ERIC JOHNSON
Chief, Organized Crime Strike Force
District of Nevada